

REMARKS

Claims 1 and 3-33 are pending in this application. By this Amendment, claims 14 and 24 are amended.

I. Information Disclosure Statement

An Information Disclosure Statement is being filed with this Amendment. It is requested that the Examiner consider the references in that Information Disclosure Statement and return an initialed Form PTO-1449 to Applicants' representative.

II. Allowed/Allowable Subject Matter

The allowance of claims 1 and 3-13 is appreciated. The indication of allowable subject matter in claims 16, 17, 26 and 27 is also appreciated, they being allowable if rewritten in independent form to include all of the features of their base claim and any intervening claims. Claims 16, 17, 26 and 27, as well as the remaining pending claims are in condition for allowance for the reasons discussed below.

III. Claim Rejections Under 35 U.S.C. §112

Claims 21-23 and 31-33 are rejected under 35 U.S.C. §112, first paragraph. The rejection is respectfully traversed.

In the Advisory Action, the Examiner explains why he believes that the claims are not enabling. However, other than again broadly asserting that it is well known that the only time a power generated by a motor could achieve a value of zero is when the motor/generator is turned off, the Examiner does not specifically explain why he disagrees with Applicants' position. The Examiner is requested to either withdraw the rejection or provide a clearer response to Applicants detailed explanation (i.e., provide evidentiary support for the common knowledge referenced in the Advisory Action). Applicants provide the detailed explanation from the previous reply.

It is alleged in the Office Action that "neither the specification nor the claims clearly show how the power generated by the motor could be negative and further the sum could be zero. It is well-known in the art that the only condition that a motor could have a zero output is when the motor is turned off. Thus, it is found by the Examiner that the teaching is not enabling to one having ordinary skill in the art."

As the rejected claims do not recite a "motor having a zero output," the relevance of the Examiner's statement is unclear. For example, claim 21 recites "a fourth sub-step of calculating a first power of said 2Y motor and a second power of said electric motor, a fifth sub-step of determining whether or not the sum of the calculated first power and said calculated second power is equal to zero, and a sixth sub-step of disconnecting, when said sum is equal to zero, said power supply from respective neutral points (M1, M2) of said first and second three-phase coils included in said 2Y motor." Thus, there is no recitation of a motor having a zero output.

Rather, the claims specifically recite a calculation of a first power and a second power. The specification gives detailed and complete examples of calculating such powers. For example, beginning at page 20, line 10, the specification describes the CPU 184 determining whether the sum of the motor power P_m and generator power P_g , mainly $P_m + P_g$ is zero or not. If the sum $P_m + P_g$ is zero, control CPU 184 disconnects the DC power supply 30 from neutral points M1 and M2 to drive motors MG1 and MG2. If the sum $P_m + P_g$ is not zero, control CPU drives motor generators MG1 and MG2 with DC power supply 30 connected to the neutral points M1 and M2.

The specification also provides detailed explanation of calculating the powers of each of the 2Y motor and the electric motor corresponding to P_m and P_g . Furthermore, because there is a relation of supply and demand between the power generator P_g and the power motor P_m , the sum of P_g and P_m can be zero when the supply and demand are balanced. It is also

well-known in the art that the power of such motors may have a negative or a zero value in some cases. For example, the motor generator MG2 may be driven in the regenerative mode to produce a negative value (see page 48, line 9 through page 49, line 5 of the specification). Thus, there is ample support throughout the specification to enable the subject matter of claims 21-23 and 31-33. Thus, withdrawal of the rejection of claims 21-23 and 31-33 under 35 U.S.C. §112, first paragraph, is respectfully requested. Furthermore, as none of claims 21-23 or 31-33 are rejected over a prior art reference, the claims are believed to be in condition for allowance.

IV. Claim Rejections Under 35 U.S.C. §103

Claims 14, 15, 18, 19, 24, 25, 28 and 29 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent Application Publication 2002/0105300 to Moriya et al. ("Moriya") in view of U.S. Patent 6,023,137 to Kumar et al. ("Kumar"). The rejection is respectfully traversed.

Neither Moriya or Kumar, whether considered alone or in combination, disclose or suggest each and every feature recited in the rejected claims. For example, the combination of references fails to disclose or suggest a motor driving method for driving a 2Y motor coupled to an internal combustion engine of a hybrid vehicle and an electric motor coupled to drive wheels of said hybrid vehicle, comprising a first step of precharging a capacitor element provided on an input side of first and second inverters controlling energization of first and second three-phase motor coils respectively that are included in said 2Y motor coupled to the internal combustion engine of the hybrid vehicle; and a second step of driving said 2Y motor and said electric motor coupled to the drive wheels of the hybrid vehicle while further charging said capacitor element after said precharging is completed. Moreover, the combination of references fails to disclose or suggest the computer readable medium as recited in claim 24.

Applicants maintain the arguments presented in the May 31, 2006 Request for Reconsideration. During a February 16, 2006 telephone interview, it was suggested that the above underlined amendments would clarify the claims to refer more specifically to a hybrid vehicle, and thus further distinguish the claims. Accordingly, in view of the previous arguments and the clarifying amendment, withdrawal of the rejection of claims 14, 15, 18, 19, 24, 25, 28 and 29 under 35 U.S.C. §103(a) is respectfully requested.

Claims 20 and 30 are rejected under 35 U.S.C. §103(a) as unpatentable over Moriya in view of Kumar and further in view of Nitta et al. ("Nitta"), U.S. Patent 6,203,468. The rejection is respectfully traversed.

Claims 20 and 30 are allowable for their dependency on their respective independent base claims, as well as for the additional features recited therein. Accordingly, withdrawal of the rejection of claims 20 and 30 under 35 U.S.C. §103(a) is respectfully requested.

V. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-33 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachments:

Petition for Extension of Time
Information Disclosure Statement

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